



September 18, 2023

Via ECF

The Honorable George B. Daniels
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

SO ORDERED

SEP 19 2023

George B. Daniels
 GEORGE B. DANIELS
 UNITED STATES DISTRICT JUDGE

Re: **KRISTINA MIKHAYLOVA V. BLOOMINGDALE'S, INC., et al.**
Case No. 19-8927

Dear Judge Daniels,

I represent Plaintiff, Kristina Mikhaylova in the above-referenced matter. With the consent of Defendants' counsel and for the reasons set forth below, I respectfully request for a one (1) day extension to the Defendants' Motion for Summary Judgment briefing deadlines. This is Plaintiff's fifth and final request. Your Honor previously granted Plaintiff's fourth request. (Dkt. No. 121).

I respectfully make this request because a modestly different version of the Defendants' filed 56.1 Undisputed Facts was previously provided to our office in word format some time ago. By happenstance while finalizing our opposition I realized the error and have been vigorously working to fix the discrepancy to meet the deadline today. However, out of an abundance of caution I am requesting a one-day extension to file our opposition to not prejudice my client as well as an additional one-day extension for Defendants to file their Reply as set forth below.

Accordingly, I respectfully request the following briefing schedule:

	Current Deadline	Proposed Deadline
Plaintiff's opposition due	September 18, 2023	September 19, 2023
Defendants' reply due	October 2, 2023	October 3, 2023

I thank Your Honor for your consideration in this matter.

Respectfully submitted,

Melissa Mendoza
 Melissa Mendoza, Esq.
 One Penn Plaza, Suite 4905
 New York, New York 10119

(212) 587-0760

cc: Via ECF

Betty T. Tierney (Counsel for Defendants)

Steven Gerber (Counsel for Defendants)